

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

WYTERRIA SIMS,)
INDIVIDUALLY, AND MARCUS)
CHATMAN, O/B/O)
THE ESTATE OF MARCUS) CIVIL ACTION FILE NO.
SIMS,)
) 1:22-cv-01696-VMC
)
PLAINTIFFS,)
)
)
v.)
)
)
WINGATE MANAGEMENT)
COMPANY, LLC,)
)
)
DEFENDANT.)

PLAINTIFFS' NOTICE OF FILING DISCOVERY

COMES NOW Plaintiffs Wyterria Sims, Individually, and Marcus Chatman, o/b/o The Estate of Marcus Sims and, pursuant to Local Rule 56.1(C), files the following exhibits with the Court in support of their Response in Opposition to Defendant's Motion for Summary Judgment and Memorandum in Support filed contemporaneously herewith:

Exhibit 1	Wingate 30(b)(6) Deposition Cynthia Bianco Vol. I
Exhibit 2	Wingate 30(b)(6) Deposition Cynthia Bianco Vol. II
Exhibit 3	Rod Teachey Deposition (Bedford Pines Chief Development Officer)
Exhibit 4	Jim Tate Deposition (Bedford Pines Security Manager)
Exhibit 5	Devin Bean Deposition (Wingate Risk Manager)
Exhibit 7	Alanna Robinson Deposition (Bedford Pines Property Manager)
Exhibit 9	Jon Groussman Deposition (Wingate Security Expert)

Exhibit 10	APD Officer Jones Deposition
Exhibit 11	Charles Ahmad Deposition (Plaintiffs' Security Expert)
Exhibit 12	Elizabeth Dumbaugh Deposition (Plaintiffs' Rebuttal Security Expert)
Exhibit 13	Karim Vellani Deposition (Wingate Security Expert)
Exhibit 14	APD Lieutenant Little Deposition
Exhibit 15	Tanya Weeks Gibson Deposition
Exhibit 16	Dr. Jane Gray Deposition (Plaintiffs' Security Expert)
Exhibit 17	Stephanie Lewis Deposition (Food Vendor at Bedford Pines)
Exhibit 27	Marcus Chatman Deposition
Exhibit 28	Wyterria Sims Deposition
Exhibit 30	Demario Newton Deposition
Exhibit 31	Ricky Phillips Deposition
Exhibit 32	Kenneth Long Deposition
Exhibit 33	Keiontay Davis Deposition
Exhibit 35	Wingate 30(b)(6) Dep. Young

Respectfully submitted this 30th day of December, 2024.

/s/ David H. Bouchard

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CERTIFICATE OF COMPLIANCE

This is to certify that the foregoing pleading has been prepared with a font and point selection approved by the Court in LR 5.1., NDGA. Specifically, the above-mentioned pleading was prepared using Times New Roman font of 14-point size.

/s/ David H. Bouchard

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CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the foregoing filing into the District's ECF System, which will automatically forward a copy to counsel of record in this matter.

Respectfully submitted this 30th day of December, 2024.

/s/ David H. Bouchard
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